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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL CAMARGO, JR.,

Defendant.

2:23-CR-00111-DJC

STIPULATION AND ORDER TO
CONTINUE ANCILLARY HEARING

The United States of America through its undersigned counsel, Kevin C. Khasigian, Assistant U.S. Attorney, and counsel for petitioner Miroslava Garcia Quintero (“Quintero”), Hugo I. Vera, hereby stipulate as follows:

On October 10, 2025, Quintero filed a motion Objecting to the Preliminary Order of Forfeiture and Request for Hearing; Petition for Ancillary Hearing regarding a 2021 Can-AM Maverick ATV forfeited from defendant Miguel Camargo, Jr., and noticed it for hearing on January 8, 2026, at 8:30 a.m.

The parties respectfully request that the Court schedule an ancillary hearing on Petitioner’s Motion [ECF No. 60] for February 26, 2026, at 9:00 a.m. The ancillary hearing date extension is requested to accommodate government counsel’s paternity leave and the parties’ ongoing negotiations concerning the 2021 Can-AM Maverick ATV.

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1 WHEREFORE, based on the foregoing, and for good cause shown, the United States and
2 Petitioner hereby stipulate that the ancillary hearing be scheduled on February 26, 2026, at 9:00 a.m.

3 Dated: January 6, 2026

ERIC GRANT
United States Attorney

5 By: /s/ Kevin C. Khasigian
6 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

8 VERA & VERA PLC

9
10 Dated: January 6, 2026

/s/ Hugo I. Vera
HUGO I. VERA
Attorney for Petitioner
Miroslava Garcia Quintero
(signature retained by attorney)

13
14 **ORDER**

15 IT IS SO ORDERED.

16 Dated: January 6, 2026

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE